

# **PMA Regulatory Bulletin**

## **SILVER DISCHARGE REQUIREMENTS FOR PHOTO PROCESSORS TIGHTEN SIGNIFICANTLY IN ALBUQUERQUE**

### **INTRODUCTION**

In response to historic low drought flows in the Rio Grande, The City of Albuquerque has significantly lowered silver limits on discharges to sewer. The silver limit has dropped from 5.0 mg/l to 1.0 mg/l and may go even lower. Facilities with city permits for wastewater discharges recently received notices of the more stringent silver discharge limitations (as well as for other waste constituents for non-imaging facilities). At this time the city has chosen not to send notification of the lower silver limits to facilities registered in the 5 ppm Silver Program, which includes all photo processing facilities, even though the limits technically apply to all silver dischargers. Notifications will likely be sent to photo processing facilities in the near future. It appears that photo processors may have a little bit of time to prepare their facilities before these more stringent limits come into play.

### **PROBLEM**

The City of Albuquerque's federally issued wastewater discharge permit dictates what the city must do to further control industrial and commercial discharges of silver and other wastewater constituents to city sewers during drought flow conditions in the Rio Grande. These responses fall into three categories:

1. Case 1. Under normal conditions when the Rio Grande flows consistently exceed 250 cfs (cubic feet per second), the limit for silver in discharges to sewer is 5.0 mg/l. This is the silver limit that everyone is used to meeting.
2. Case 2. When river flows are below 250 cfs, even for one day a month, the silver discharge to sewer limit is required to drop to 1.0 mg/l.
3. Case 3. When river flows are between 0 to 25 cfs during July through October, or 0 to 250 cfs during November through June, the city's permit requires silver discharges to sewer not to exceed 0.8 mg/l.

### **CITY OF ALBUQUERQUE'S POSITION**

The city really has little discretion on silver limits as they are mandated in their federal discharge permit. The city has worked closely with silver users over the years to implement fair and reasonable controls for silver in wastewater discharges. In August the city implemented the Case 2 silver discharge limit of 1.0 mg/l at the end of silver recovery and this limit continues to be in force. Continued drought conditions in the Rio Grande are expected to result in the City's imposition of the lower 0.8 mg/l (Case 3) silver discharge limit yet this fall. It is very likely that drought flows in the Rio Grande will continue through next summer and beyond.

## CAN YOU MEET THESE NEW LIMITS?

Many facilities will be able to meet these limits, but some may not. Meeting a 1.0 mg/l silver limit consistently over time can be difficult for labs of all sizes. Meeting a silver limit of 0.8 mg/l can be very problematic, especially for smaller labs.

## WHAT CAN YOU DO?

### 1. Silver Recovery System

- Take action now to prepare your facility to meet these lower silver limits. Waiting until the compliance inspector walks through your door is too late.
- At a minimum, check and maintain your silver recovery (SR) system so it is in top efficiency. Establish a SR maintenance schedule.
- Provide staff with training on the inspection and maintenance of your SR system.
- When was the last time you rotated or exchanged SR cartridges?
- Consider more frequent cartridge rotations to maintain the SR unit's highest efficiencies and provide the greatest likelihood for compliance.

### 2. Silver Recovery vendors

- Contact your SR equipment vendors and ask whether your equipment is capable of meeting the 1.0 or 0.8 mg/l silver limits at a point immediately following silver recovery.
- Will it meet the limits consistently?
- Seek their assistance on what you need to do to maximize the SR system's so you can consistently meet these lower silver limits.
- In some cases a new or updated SR system may be needed for you to meet these new limits.

### 3. If You Can't Meet the New Silver Limits

- If the city's testing determines that you are in non-compliance with the lower silver limits, they will issue a notice of violation and place you on a "return to compliance schedule".
- Hauling silver-bearing wastes for off-site treatment and disposal may be the only option for some labs.
- If you think that non-compliance is a possibility for your system, even with close attention and maintenance, consider developing a stand-by plan to implement the hauling of silver-rich wastes for off-site treatment and disposal.
- Contact your SR vendor or PMA for assistance in identifying waste hauling services that you could utilize, should the need arise.

If you need further information or assistance, call your silver recovery vendor, the PMA Environmental Activities Department (800-762-9285, [environmental@pmai.org](mailto:environmental@pmai.org)), your sensitized goods manufacturer, or the Albuquerque Industrial Pretreatment Program (Stuart Reeder, Industrial Waste Engineer 505-873-7047; Bob Hogrefe, Pretreatment Program Manager 505-873-7030).